

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GEORGE MALTMAN and	:	CIVIL ACTION
SUSAN MALTMAN, h/w	:	
	:	
v.	:	
	:	
BAE, BNP, TURNER CONSTRUCTION	:	
and GRAINGER INDUSTRIAL SUPPLY	:	NO.: 02-CV-4582

**RULE 26 INITIAL DISCLOSURES OF DEFENDANT, W.W. GRAINGER, INC.**

Pursuant to Federal Rule of Civil Procedure 26(a), Defendant, W.W. Grainger, Inc., by and through its counsel, Sweeney & Sheehan, P.C., state as follows:

**A. Names, last known addresses and telephone numbers of individuals likely to have discoverable information:**

Defendant, W.W. Grainger, Inc., has not been able to ascertain whether any product it sold or distributed was in any way involved in the Plaintiff's accident which underlies this litigation. As such, Defendant cannot identify any individual with discoverable information.

**B. A copy of or a description of all documents, data compilations and tangible things that are in possession, custody or control of the disclosing party:**

See response to A above.

**C. A computation of damages:**

None.

**D. Any insurance agreements under which any person or entity may be liable to satisfy all or part of a judgment:**

Travelers Insurance Company, policy period 1/1/99 - 1/1/01; \$5,000,000.00 per occurrence, \$8,000,000.00 aggregate; \$4,975,000.00 deductible.

**SWEENEY & SHEEHAN**

By: \_\_\_\_\_

Robyn F. McGrath  
Identification No.: 55892  
Attorney for Defendant,  
W.W. Grainger Inc.

1515 Market Street, 19<sup>th</sup> Floor  
Philadelphia, PA 19102  
(215) 563-9811

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GEORGE MALTMAN and	:	CIVIL ACTION
SUSAN MALTMAN, h/w	:	
	:	
v.	:	
	:	
BAE, BNP, TURNER CONSTRUCTION	:	
and GRAINGER INDUSTRIAL SUPPLY	:	NO.: 02-CV-4582

**CERTIFICATION OF SERVICE**

I hereby certify that the following counsel of record were served with a true and correct copy of the **RULE 26 INITIAL DISCLOSURES OF DEFENDANT, W.W. GRAINGER, INC.** in the above-captioned matter by U.S. Postal Service, First Class Mail on September 16, 2002:

**SWEENEY & SHEEHAN**

By: \_\_\_\_\_  
Robyn F. McGrath

**INTERESTED COUNSEL:**

Theresa Mogavero Simmons, Esquire  
**Cordisco, Bradway & Simmons**  
234 Mill Street  
Bristol, PA 19007

Brett D. Stecker, Esquire  
**Blank, Rome, Comisky & McCauley**  
One Logan Square  
Philadelphia, PA 19103

Andrew Fylypovych, Esquire  
**McKissock & Hoffman**  
1700 Market Street  
Suite 3000  
Philadelphia, PA 19103-3930